

JUL 25 2013

UNITED STATES DISTRICT COURT

UN-Sealed

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SL2 7/25/13

David J. Bradley, Clerk of Court Southern

DISTRICT OF

Texas

UNITED STATES OF AMERICA

V.

ALEXANDER JOSEPH JOHNSON

CRIMINAL COMPLAINT

Case Number:

14 13.741m

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 6/1/2013 in Harris County, in the Southern District of Texas defendant(s) did,

(Track Statutory Language of Offense)

knowingly, in or affecting interstate or foreign commerce, recruited, enticed, harbored, transported, provided, maintained a person knowing, or in reckless disregard of the fact, that means of force, fraud, or coercion was used to cause a person under the age of 18 to engage in a commercial sex act.

in violation of Title 18 United States Code, Section(s) 1591(a).

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following facts:

Official Title

See the attached affidavit of FBI Special Agent Theo Williams

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ No

Signature of Complainant

Theo M. Williams

Printed Name of Complainant

Sworn to before me and signed in my presence,

Date

at

Houston  
City

Texas  
State

Stephen Wm. Smith  
Name of Judge

U.S. Magistrate  
Title of Judge

Signature of Judge

## **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Theo Moses Williams, being duly sworn, depose and state:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to the Special Agent in Charge (SAC), in Houston, Texas. I am currently employed as an Investigator on the Houston Child Exploitation Task Force (HCETF) that is tasked to investigate crimes involving sex trafficking of children. I have been a Federal Agent since 2009. I have been assigned to the HCETF since the spring of 2011, and have been tasked with the investigation of sex trafficking of children. During this time, I have investigated more than 100 cases involving sex trafficking of children, including sex trafficking of children via the internet. As part of my daily duties as an FBI agent, I investigate criminal violations relating to sex trafficking of children, in violation of 18 U.S.C. § 1591 (a). I have received training in the area of sex trafficking of children and child exploitation. I have had the opportunity to observe and review numerous examples of sex trafficking of children.

2. Sex trafficking of children, as defined in 18 U.S.C. § 1591 (a), is:

(a) Whoever knowingly—

(1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, or maintains by any means a person; or

(2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1),

Knowing, or in reckless disregard of the fact, that means of force, fraud, coercion described in subsection (e)(2), or by any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).

3. This Affidavit is made in support of a criminal complaint charging Alexander Joseph JOHNSON with violating 18 U.S.C. § 1591(a), which makes it a crime to traffic children for the purpose of sex.
4. I am familiar with the information contained in this Affidavit based upon the investigation I have personally conducted and my conversations with other law enforcement officers involved in this investigation, or who have engaged in numerous investigations involving sex trafficking of children.
5. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of an ongoing violation of 18 U.S.C. § 1591(a) has been committed by Alexander Joseph JOHNSON on or about June 1, 2013 to the present. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.
6. On July 19, 2013, Affiant was contacted by Task Force Officer (TFO) David Nieto, of the Houston Police Department (HPD). Nieto informed Affiant that a fifteen (15) year old juvenile was recovered by HPD Vice Division officers. Affiant and TFO Nieto reported to 8300 Mykawa, HPD Juvenile Intake Division, to interview the victim L.S., D.O.B. 08-07-97.
7. On July 19, 2013, Affiant and TFO Nieto conducted an audio recorded interview of L.S. L.S. disclosed to Affiant and TFO Nieto that in June 2013, she was transported from Austin, TX to Houston, TX with a woman named MELANIE last Name Unknown (LNU). MELANIE introduced L.S. to JOHNSON. JOHNSON forced L.S. to prostitute

in Houston, TX, utilizing online advertisements posted on BACKPAGE.COM.

JOHNSON told L.S. how much to charge a client for sexual services. L.S. had a quota of \$500 per day that she was required to earn for JOHNSON. If the quota was not reached, threats of violence were made. JOHNSON provided L.S. with condoms and a cellular telephone. L.S. would be beaten if a phone call from JOHNSON went unanswered. L.S. never missed a phone call, and always exceeded her quota. JOHNSON's form of rewarding L.S. for exceeding her quota was to force her to have sex with him. On one occasion, JOHNSON beat L.S. for making a mistake while rolling his marijuana cigarette. JOHNSON provided marijuana and alcohol to L.S. L.S. was provided food at JOHNSON's discretion.

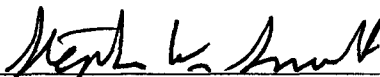
8. On or about July 12, 2013, JOHNSON transported L.S. and an adult female named CAMERY LNU to Denver, CO where they worked as prostitutes. L.S. can be seen in Denver and Colorado Springs BACKPAGE.COM advertisements indicative of prostitution services.
9. The week of July 15, 2013, L.S., CAMERY, and JOHNSON returned to Houston, TX. L.S. was posted in Houston BACKPAGE.COM advertisements indicative of prostitution. These advertisements were made using an email address associated with JOHNSON.
10. On July 19, 2013, L.S. was recovered by HPD Vice Division officers at the La Quinta Inn, located at 1625 W 610 Loop S Freeway, Houston, TX. Records from the La Quinta Inn show JOHNSON as the customer who rented the room. L.S. was interviewed by Affiant and TFO Nieto at 8300 Mykawa, HPD Juvenile Intake Division.

11. On July 20, 2013, L.S. ran away from the Burnett-Bayland Rehabilitation Center located at 6500 Chimney Rock, Houston, TX. L.S. became frightened because she was alone and men were harassing her. Out of desperation, L.S. called JOHNSON. JOHNSON was suspicious law enforcement were watching L.S. JOHNSON sent an unknown associate to L.S.'s location at a Jack in the Box restaurant, near Burnett-Bayland Rehabilitation Center. That associate transported L.S. to a Red Roof Inn located at 15701 Park Ten Place Houston, TX, where she worked as a prostitute. L.S. was required to work extra because she was arrested and unable to meet her quota while in custody. JOHNSON suggested re-photographing L.S. to change her appearance. L.S. recommended using the same pictures JOHNSON used in previous advertisements. L.S. knew that law enforcement was familiar with the pictures and would be able to locate her.
12. On July 23, 2013, members of HCETF recovered L.S. from the America's Best Value Inn Hotel located at 16410 North Fwy, Houston, TX. Hotel records show JOHNSON as the customer that rented the room.
13. JOHNSON has been identified by his Texas driver's license used to rent hotel rooms. TFO Nieto attempted to question JOHNSON in the lobby of the America's Inn, but JOHNSON ran to his gray BMW and sped away. The license plate on the gray BMW comes back to Alexander Joseph JOHNSON. L.S. described one of JOHNSON's tattoos as being a large letter B located on his neck. A tattoo of a letter B can be seen on JOHNSON's driver's license photo used to rent hotel rooms.
14. Based upon the information delineated above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Alexander Joseph JOHNSON with a violation of 18 U.S.C. §1591(a) - Sex trafficking of children.



Theo Moses Williams  
Special Agent, FBI

Subscribed and sworn before me this 25 of July 2013, and I find probable cause.



Stephen Wm. Smith  
United States Magistrate Judge